

EXHIBIT I

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DELTON GOODRUM)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:24-cv-01111 (PTG/WEF)
)	
CITY OF ALEXANDRIA, a municipal.)	
Corporation of Virginia)	
)	
Defendant.)	
)	

DECLARATION OF CYNTHIA HURLEY

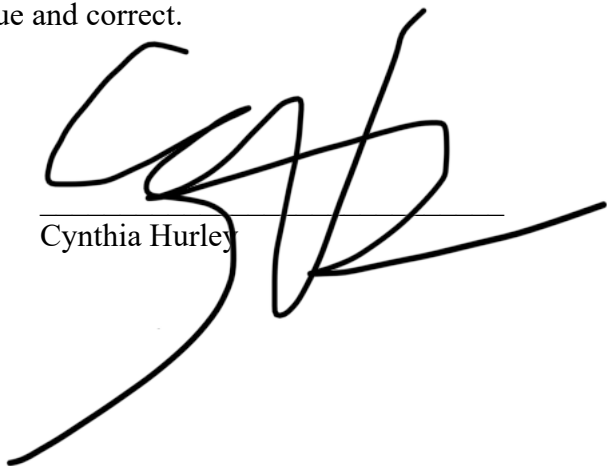
I, Cynthia Hurley, declare as follows:

1. My name is Cynthia Hurley.
2. I am over the age of eighteen (18) and have personal knowledge of the facts declared within.
3. I am an officer at the Alexandria Police Department, where I began my employment in or around 2004.
4. In 2020, I transferred to the Human Resources and Training Division where I worked under the supervision of Lieutenant Delton Goodrum. Lt. Goodrum and I transferred to this Division at approximately the same time.
5. Under the supervision of Lt. Goodrum, a class of candidates we recruited to send to the Academy consisted of approximately twenty-nine (29) individuals, which I believe is the largest number of recruits ever sent to the Academy by the Department.
6. During Lt. Goodrum's tenure in the position of Training and Recruiting Commander, we successfully brought in diverse recruits that more accurately reflected the surrounding community.
7. Recruitment suffered during COVID, but we still managed to bring in qualified individuals who would pass the Academy and become employed by the Department. Neighboring agencies and departments contacted us to ask what we were doing and how we were managing to recruit the number of candidates we sent to the Academy.

8. Lt. Goodrum was active and innovative in his position as Training and Recruiting Commander. Lt. Goodrum encouraged regular patrol officers outside of the Human Resources and Training Division to assist with recruitment efforts and attend different recruiting events.
9. In December 2022, I was part of a group of officers — including four sergeants — who met with Chief Don Hayes at his office to discuss our concerns about race discrimination within the Department. All of the officers and sergeants who attended this meeting were people of color.
10. We reviewed the number of people of color currently serving at the command level within the Department with Chief Hayes and expressed our concern that, if the pattern continued, the entire command staff would consist of white males in the coming years.
11. We also shared with Chief Hayes our own personal experiences with discrimination within the Department and presented the stories of other department employees who experienced discrimination that had been shared with us.
12. Chief Hayes was not receptive to the issues we brought to his attention. He only asked us what we planned to do about it, and took no action himself to address the issues we had raised.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 25, 2025.



Cynthia Hurley